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Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Amendment of Part 74 of
the Commission's Rules
and Regulations with
Regard to the Low Power
Television Service

RM-7772

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FILE

To: The Commission

COMMENTS OF THE COMMUNITY BROADCASTERS ASSOCIATION

1. The Community Broadcasters Association ("CBA") is the petitioner in RM-7772. For all of the reasons stated in the Petition for Rule Making, CBA urges the Commission to move promptly and to issue a Notice of Proposed Rule Making looking toward adoption of CBA's proposals at an early date.

2. One of the points made in CBA's petition is the difficulty that LPTV stations have establishing their identity with advertising agencies and audience measurement services because the format of their call signs is different from that of conventional television stations. Attached hereto is yet another example of how an advertising agency could not handle an address with the call letters "W43AG" but instead had to eliminate the two numerical digits. LPTV stations that seek to provide substantial local service should not have to suffer this kind of "identity crisis," which prevents them from achieving the full recognition that their programming service would otherwise obtain.

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